

241828

RSPA-97-3100-25

11993-M
#45111

B R E E D

DO NOT REPLY TO THIS
OFFICE OF TRANSPORTATION
02 SEP 20 11 ID: 43

World Headquarters
5300 Allen K. Breed Highway
P.O. Box 33050
Lakeland, Florida 33807-3050
Telephone 863-668-6000
Fax 863-668-6228

September 19, 2002

Associate Administrator for Hazardous Materials Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001
ATTN: Exemptions, DHM-31

2003 APR 29 PM 3:55
OFFICE OF TRANSPORTATION
DOT/ELIS

SUBJECT: APPLICATION FOR MODIFICATION OF EXEMPTION DOT-E 11993

Dear Mr. McGuire:

Pursuant to the requirements of 49 CFR 107.105, BREED Technologies, Inc.

Street Address:
5300 Allen K. Breed Highway
Lakeland, FL 33811

Mailing Address:
P.O. Box 33050
Lakeland, FL 33807-3050

Agent of the Applicant:
David Gamlen
(863)668-6035 telephone
(863)668-6228 fax
gamlend@breedtech.com e-mail

Main Telephone Number:
(863)668-6000

Registration Number: M5118

requests modification of Exemption DOT-E 11993 for the manufacture, marking and sale of non-DOT specification cylinders (pressure vessels) for use as components of automobile safety restraint systems. This application is submitted in duplicate.

BREED Technologies, Inc. has shipped approximately 108,000 packages to date against this exemption. There have been no known incidents or loss of contents in connection with this exemption.

This modification request is based on 49 CFR 107.121(a)(1) in that a modification is necessary so that the exemption reflects current statutes and regulations.

In the "Recommendations on the Transport of Dangerous Goods – Model Regulations", twelfth revised edition, the entry for UN number 3353, Class 2.2, has been removed. Federal authorities in Europe have stated their intention in the ADR to classify Air Bag Inflators and Modules to either Class 9, UN3268 or Class 1.4G, UN0503, effective January 1, 2003. It is also anticipated that ICAO's "Technical Instructions for the Safe Transport of Dangerous Goods by Air" and IMO's "International Maritime Dangerous Goods" code will contain the same changes. Additionally, BREED is a member of the North American Automotive HazMat Action Committee (NAAHAC), so we are aware that 49 CFR will also be harmonized.

The requested modification is to the table in paragraph 6, titled HAZARDOUS MATERIALS (49 CFR 172.101). In order to reflect pending changes effective January 1, 2003, please add Class 9 and 1.4G to the Hazard Class / Division column. Also, please change the Packing Group column from "N/A" to "As required".

No other changes are requested at this time.

The hazardous materials defined in BREED's renewal application dated September 28, 2001 remain current.

Please contact me by facsimile at (863)668-6228, by telephone at (863)668-6035 or by e-mail at gamlend@breedtech.com if you have any questions or need additional information to process this application.

Sincerely,



David Gamlen
Manager, Packaging Engineering

Cc: Arrowhead Industrial Services, Inc.

VPackaging Engineering\E-11993\11993UNmod.doc